

ZISHOLTZ & ZISHOLTZ, LLP

170 Old Country Road, Suite 300

Mineola, New York 11501

Tel.: (516) 741-2200

Fax: (516) 746-1024

Attorneys for Defendant, The Closing Network, Ltd.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AURORA LOAN SERVICES LLC,

Docket No.: 09-CV-9651 (HB)

Plaintiff,

-against-

NOTICE OF MOTION

DAVID SADEK; WINTHROP ABSTRACT, LLC,
FIRST FINANCIAL EQUITIES, INC.; THE
CLOSING NETWORK, LTD.; 100 W. 58TH ST. 7C
LLC; MORTGAGE ELECTRONIC REGISTRATION
SYSTEMS, INC.; JPMORGAN CHASE BANK, N.A.;
BOARD OF MANAGERS WINDSOR PARK
CONDOMINIUM; WINDSOR TOV LLC; FREMONT
INVESTMENT & LOAN; JOHN DOES 1-10,

Defendants.
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PLEASE TAKE NOTICE, that upon the annexed Affidavit of **Steven Kwestel**, duly sworn to the 10th day of June, 2011, and the annexed Affirmation of **Meng Cheng** duly subscribed on the 10th day of June, 2011, and upon the Memorandum of Law, and upon all the pleadings and proceedings heretofore had herein, the undersigned will move this Court before Hon. Harold Baer, Jr., United States District Judge, at the United States District Court, Southern District of New York, located at 500 Pearl Street, New York, New York 10007, on the 27th day of June 2011, at 9:30 a.m., or as soon thereafter as counsel can be heard for an Order:

1. granting summary judgment pursuant to the Federal Rules of Civil Procedure 56 dismissing the claims for breach of contract and negligence against the Defendant, **THE CLOSING NETWORK, LTD.**, and

2. granting the Defendant, **THE CLOSING NETWORK, LTD.** such other, further and different relief as the Court may deem just and proper in the premises.

PLEASE TAKE FURTHER NOTICE that answering affidavits, if any, must be served at least five (5) days before the return date of this motion.

PLEASE BE FURTHER ADVISED that if you do not respond in opposition to the motion, the motion for summary judgment, if appropriate, will be granted and a judgment will be entered against you.

Dated: Mineola, New York
June 10, 2011

Yours very truly,

ZISHOLTZ & ZISHOLTZ, LLP

By: 

Meng Cheng
Attorneys for Defendant,
THE CLOSING NETWORK, LTD.
170 Old Country Road, Suite 300
Mineola, New York 11501
(516) 741-2200

To: **TOMPKINS, McGUIRE, WACHENFELD
& BARRY, LLP**

Attorneys for Plaintiff,
AURORA LOAN SERVICES LLC
Four Gateway Center
100 Mulberry Street, Suite 5
Newark, New Jersey 07102
(973) 622-3000

CULLEN and DYKMAN, LLP
Attorneys for Defendant,
JP MORGAN CHASE BANK, N. A.
1000 Quentin Roosevelt Blvd,
Garden City, New York 11530
(516) 357-3700